

EXHIBIT 1

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

BRIAN HALL, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

FORBES MEDIA LLC, an Delaware
corporation,

Defendant.

Case No. 2:15-cv-13844

Hon. George Caram Steeh

DECLARATION OF NINA LAFRANCE

Pursuant to 28 U.S.C. § 1746, I, Nina LaFrance, declare as follows:

1. I am Senior Vice President, Consumer Marketing & Business Development at Forbes Media LLC (“Forbes”), the defendant in the above-captioned action. I submit this declaration in support of Forbes’ motion to stay the action pending a decision by the Sixth Circuit Court of Appeals in *Coulter-Owens v. Time, Inc.*, Case No. 16-1321. This declaration is based on my personal knowledge and/or information supplied by persons employed by Forbes.

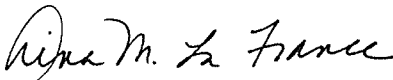
2. Forbes is a global media, branding and technology company, with a focus on news and information about business, investing, technology, entrepreneurship, leadership and affluent lifestyles. Forbes publishes a number of magazines and websites, including *Forbes* magazine.

3. I directed a person on my staff to search Forbes' customer subscription records for *Forbes* magazine for records relating to the named plaintiff in this action, Brian Hall. These records, which are maintained during the ordinary course of business, detail the subscribers' names and how the subscriber purchased their subscription to *Forbes*.

4. According to these records, I discovered that Mr. Hall purchased a single year subscription to *Forbes* magazine in August 2009 from a third-party agent, not from Forbes directly.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 23rd day of May, 2016, in Jersey City, New Jersey.



Nina LaFrance